

Stakeholder Comments on Utah RPS Strawman

Mandatory vs. Voluntary

All of the utilities and the CCS believe that voluntary targets are sufficient to meet the REI objectives and are the preferred course of action. However; advocates, renewable energy developers, academics, local governments and citizen groups believe mandatory targets are required to meet the REI goals and are a necessary means to address externalities.

If There is a RPS, Issues that Need to be Addressed

- The cost-effective standard (RMP, DPU, Shoshone Energy,)
- System reliability (RMP, DPU)
- The non-profit status of the Muni's and the impact on RPS design (UAMPS, UMPA)
- Creation of artificial markets (RMP, DPU)
- The need to conduct economic impact study (UAE, DPU, CCS, UAMPS, UMPA, UREA)
- The question of existing facilities was never answered.

RPS Design Features

Areas of Agreement

There are design features that most stakeholders can agree should be present in a RPS:

- The use of Renewable Energy Certificates (REC's) (d)
- The recovery of prudently incurred costs (h)
- Cost Caps (i)
- Alternative Compliance Payments (ACP) (j)

Note: the above areas of agreement are for the design features as concepts not for the specifics of the strawman.

Range of Opinion

The following design features had a range of opinion:

Target (a)

Opinion	Supporters
More Aggressive	UCE, SC, SLC, WW, WRA, Interwest, Utah Moms, SunEdison
Less Aggressive	RMP, UAMPS, UMPA, UREA
Require % of Solar Development	UCE, SC, SLC, WW, WRA, Interwest, Utah Moms, SunEdison, Hans

Definition of Renewables (b)

Opinion	Supporters
Current Statute w/Qualified Hydro	UCE, SC, SLC, WW, WRA, Interwest, Utah Moms, Sun Edison,
Current Statute w/All Hydro	UAMPS, UMPA, UREA
Low Carbon (energy efficiency, DSM, etc)	RMP, UAE, DPU

Compliance (c)

Opinion	Supporters
Interim Targets	UCE, SC, SLC, WW, WRA, Interwest, SunEdison,
Flexibility in Targets	RMP, UAE, DPU

Other Issues

CCS felt that the leaders of this process only did a cursory review of other states and that the Minnesota RPS should be modeled, especially Modification or Delay of Standard Provision

Wasatch Wind and Shoshone Energy wanted a discussion of the RFP process as part of the RPS.

CCS-Committee of Consumer Services, RMP-Rocky Mountain Power, DPU-Division of Public Utilities, UAMPS- Utah Associated Municipal Power Systems, UMPA-Utah Municipal Power Agency , UAE-Utah Association of Energy Users, UCE-Utah Clean Energy, SC-Sierra Club, SLC-Salt Lake City, UREA-Utah Rural Electric Association, WW-Wasatch Wind, WRA-Western Resource Advocates